

Otsuka et al. v. Polo Ralph Lauren et al.
 United States District Court Northern District of California
 Case No. C07-02780 SI

FILED

MAR 29 2009

RICHARD W. WIEKING
 U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

Defendants' Trial Exhibit List¹
(Excluding Charts and also Excluding Exhibits Solely for Impeachment or Rebuttal)

Exhibit No.	Bates No.	Date	Description	Supporting Witness	Supporting Witness
200	N/A	Undated	Map and List of Polo Ralph Lauren Store Locations	Kristi Mogel, Sharonda Weatherspoon; Diana Copeland	
201	POLO00133-00134	04/28/2004	Janis Howay Application for employment	Janis Howay, Kristi Mogel	
202	POLO00144	05/24/2004	Janis Howay Signed Policy and Procedure Acknowledgement form	Janis Howay, Kristi Mogel	
203	POLO00130	06/01/2004	Janis Howay Signed Receipt for Employee Handbook form	Janis Howay, Kristi Mogel	
204	POLO00128	11/26/2004	Janis Howay Performance discussion recap form	Janis Howay, Kristi Mogel	
205	POLO01766-01767; POLO01757-01761; POLO01748	Various Dates	<ul style="list-style-type: none"> Renee Davis Performance discussion recap form (POLO01766-001767) 08/10/2003 Renee Davis Performance discussion recap form (POLO01757) 02/07/2004 Renee Davis List of absences from work (POLO01758-01759) Letter to Renee Davis from April Hicks discussing attendance 	Renee Davis, Sharonda Weatherspoon	

Pg Bates # 1748 in 3/17/0

¹ Defendants reserve the right to supplement trial exhibit list as trial preparation progresses.

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Exhibit No.	Bates No.	Date	Description	Supporting Witness	Stipulation
			(POLO01760-01761) <ul style="list-style-type: none"> Davis letter of resignation (POLO01748) 02/28/2004 		
206	POLO001026	Undated	Speak Up" flyer to report unethical activity	Renee Davis, Sharonda Weatherspoon	
207	POLO01785	11/21/2002	Renee Davis Loss Prevention Signature Form	Renee Davis, Sharonda Weatherspoon	
208 3/16/10	POLO00151; POLO00146-00148	06/07/2004	<ul style="list-style-type: none"> Corinne Mullen Application for employment Corinne Mullen resume (POLO00146-00148) 	Corinne Mullen, Kristi Mogel	
209	POLO00145	06/28/2004	<ul style="list-style-type: none"> Corinne Mullen Signed Personnel Authorization Form 	Corinne Mullen, Kristi Mogel	
210 2/16/10	POLO00156-00158	Various Dates	<ul style="list-style-type: none"> Corinne Mullen Signed Acknowledgement of Temporary Assignment form (POLO00156) 06/29/2004 Corinne Mullen Signed Associate Discount Policy (POLO00157) 06/29/2004 Corinne Mullen Safety Training Acknowledgement (POLO00158) 	Corinne Mullen, Kristi Mogel	
211	POLO00159	06/23/2004	Corinne Mullen Signed Receipt for Employee Handbook form	Corinne Mullen, Kristi Mogel	

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Exhibit No.	Bar No.	Date	Description	Supporting Witness	Significant
212	POLO00164	10/25/2004	Corinne Mullen Employee Personnel Action Form	Corinne Mullen, Kristi Mogel	
213 3/16/10	PHIPPS CONFIDENTIAL 2-8	Undated	Pay Stubs for periods ending 08/28/04, 07/31/04, 07/17/04, 09/11/04, 10/09/04, 08/14/04	Corinne Mullen, Joanne Canovas, Beth Flynn	
214	POLO03634-03635	00/00/2001	LP Awareness Training Module: Senior Management Loss Prevention Policies	Alyson Gunder	
215 3/24/10	POLO02058-02122; POLO09774-09777; POLO060134-060173	00/00/2003-00/00/2009	2003-2009 Reconciliations	Evan Cohen	
216	POLO03608-03633	09/00/2007	Memo re: 2003-2006 Overtime Re-Conciliation	Evan Cohen	
217	N/A	10/05/2009	Hossein Borhani Expert Report and all supporting documentation	Dr. Hossein Borhani	
218	N/A	Undated	Sample Wage and Hour Class Action Questionnaire prepared by Dr. Dwight Steward	Dr. Dwight Steward	
219	N/A	Undated	Compilation of data from questionnaires sent by Dr. Dwight Steward	Dr. Dwight Steward	
220	N/A	06/20/2008	Declaration of Polo Sales Associates, Stock Supervisors, Senior Sellers, Key Holders, Supervisors, Lead Cashiers, In Support of Defendants' Opposition to Motion for Class Certification Michiko Takada Adam Bourque Alina Avakyan	Judicial Notice	

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			Lawrence Barbosa Josephine Sahyoun Kathryn Cantwell Morgan Simmons Holly Beaty Robert Lo Monaco Desiree Dillon Laura Hanes Aaron King Dorsie May Stevens Kimell Ellington Brandi Ellsworth Bao Yang Abdel-Rahim Shalabi Sergio Silva-Canseco Andrea Rocca Lindsey Flores Bianca Benavente Roberto Limones Ruben Escalente Oscar Segura Natalie Vicino		
221			Declarations of Polo Store General Managers, Co-General Managers, Assistant General Managers, District Managers, In Support of Defendants' Opposition to Motion for Class Certification Nina Holowka Nilly Foster Ann Powell Jenna Baker John Messersmith		

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			Catherine L. Post Everett Ferreira Diane Wilson Tanya Taylor Andrea Williams Lianne Ishikawa Hillary Tucker Nancy Hong Sandra Brodie Timothy Homan Carin Pennisi Carey Hernandez David Botello Arriana Burkleo		
222	POLO00256-00264	05/01/2004- 08/30/2005	Payroll Hours by Employee Report		
223	POLO00268-00270	08/00/2004- 08/00/2005	Payroll Time Cards		
224	POLO00271-00274	05/00/2004- 07/00/2005	Payroll Manual Adjustments Report		
225	N/A	Undated	CD - Polo Employee Bag Inspections Video Clips	Alyson Gunder	
226	POLO03652-03655	Undated	CD - Polo Training Videos	Alyson Gunder	
227	N/A	Undated	CD - Polo Background Documents (Dwight Steward)	Dr. Dwight Steward (Beth Flynn, Joanne Canovas)	Admissible
228	N/A	Undated	CD - Polo Supporting Documents (Dwight Steward)	Dr. Dwight Steward, Beth Flynn, Joanne Canovas	Admissible
229	N/A	11/19/2009	CD - Hossein Borhani Deposition Backup Documents	Dr. Hossein Borhani, Beth Flynn, Joanne	Admissible

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Exhibit No.	Exhibits No.	Date	Description	Supporting Witness	Signature
330	Notice to Class	3/22/10	(Hessein-Berham)	Canovas	

Class
 4/21/09